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GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



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DIRECTOR

April 5, 2011

Mr. Michael Berkoff  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard (SRF-6J)  
Chicago, Illinois 60604-3507

US EPA RECORDS CENTER REGION 5



Dear Mr. Berkoff:

**SUBJECT:** Comments on the Final Remedial Design, Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site, Operable Unit 2: Willow Boulevard/A-Site Landfill

The Michigan Department of Environmental Quality (MDEQ) has received (March 15, 2011) and reviewed the Final Remedial Design Report, Specifications, and Construction Drawings for the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site, Operable Unit 2: Willow Boulevard/A-Site Landfill prepared by ARCADIS on behalf of Georgia-Pacific LLC. The MDEQ appreciates the opportunity to assist the United States Environmental Protection Agency (USEPA) by providing comments on the Final Remedial Design Report, Specifications, and Construction Drawings for the Willow Boulevard/A-Site Landfill.

This comment letter also includes comments from Ms. Judith Alfano on behalf of the Natural Resources Damages Trustees. Comments are presented below corresponding to the specific sections of the report and/or plan set.

### **General Comments**

In general, the Final Design submittal addresses the comments generated from the Pre-Final Design with the exception of comments regarding the design, construction, and implementation of the long-term monitoring network which will be addressed as a part of the Remedial Action Work Plan.

The terms "restoration," "mitigation," "habitat reconstruction," and "wetland restoration" are used throughout the document, specifications, and drawings. Specific definitions for each term would be helpful. For example, "mitigation" is an action taken to repair impacts resulting from response activities, and "restoration" is a term better used in connection with activities pertaining to natural resource damage injuries. Wetland "restoration" results from activities occurring in wetlands requiring mitigation under state and federal laws. Please review the final design submittal and standardize the use of the terms restoration, mitigation, habitat reconstruction, and wetland restoration to adhere to a specific definition of each term.

All areas requiring grubbing, tree clearing, or other actions resulting in damage to natural resources and resulting habitat should be documented in photographs or video for inventory with reference points prior to the start of site work. Additionally, all removed root balls containing residuals should be consolidated under the landfill cap.

## **Remedial Design Report**

### *Section 2.3 - Indiana Bat Habitat Survey and Mussel Survey*

The Natural Resource Damages Trustees recommend relocation of mussels because of their long life span and sporadic reproduction.

### *Appendix: Performance Standards Verification Plan*

Section 4.1.4 will need to specify the time frame when the referenced response work plan will be submitted to the USEPA.

Section 4.1.5 will need to reference that replacement monitoring wells will be replaced in accordance with the procedures identified in the Groundwater Monitoring Plan.

Section 6.2 states that any areas that require maintenance or repair will be identified and a repair plan will be designed for implementation prior to the next semiannual monitoring event. It will be necessary to repair bank stabilization and revegetation measures within a shorter time frame than six months.

Section 6.3 identifies that, if all performance standards are met before the end of the fifth year of monitoring, the short-term monitoring program will end and inspection will continue as described in the operation and maintenance plan. As noted in comments for Appendix J, there are components of the short-term monitoring plan that have not been adequately carried onto the long-term monitoring plan such as riverbank stabilization measures, erosion control system, or the restored/created wetlands. These components of the remedy will require long-term monitoring in some capacity.

### *Appendix H: Construction Quality Assurance Project Plan*

Section 2.3 and Table 2-1 will need to be completed and distributed prior to the start of site work.

### *Appendix J: Draft Operation and Maintenance Plan*

Generally, the Draft Operation and Maintenance Plan (OMP) presented in this design submittal relies heavily on reference to the Performance Standards Verification Plan (PSVP). There are several circular references between the two plans that intend to direct the reader to the necessary information; however, the necessary information is not present in either plan. For example, the Section 3.8 (Restored/Created Wetlands)

of the draft OMP contains only one sentence: "The restoration components of the design (i.e., restored and created wetlands) will be visually inspected as described in the PSVP." The PSVP describes Mitigation Site Monitoring in Section 6 which concludes with the sentence: "After the performance standards described above have been achieved, inspection and monitoring efforts will continue as described in the Operation and Maintenance Plan for the project (to be included in the Final Design Submittal)." As the OMP will serve to be a stand-alone document for future use beyond the time frame of the remedial action, it is necessary to incorporate all needed information into the OMP now.

As required by Task 5 of Section III of the Statement of Work (SOW), Appendix C to the United States of America v. Georgia-Pacific LLC Consent Decree (Civil Action No. 1-09-cv-429), a schedule showing frequency of each operation and maintenance task is necessary. Additionally, it is very difficult to identify if all the specified components of Task 5 have been presented since information is distributed between the OMP and the PSVP. There are several instances where the OMP lacks the necessary level of detail described in the SOW; however, some of the detail may be present in the PSVP but cannot be easily identified.

Section 3.1 references final cover system inspections to be performed in conjunction with berm stabilization inspections; however, berm stabilization inspections are not described in Section 3 - Inspection and Monitoring at WB/A-Site OU.

Section 3.2 does not contain adequate detail of the frequency and documentation of the riverbank stabilization measures inspections.

Sections 3.5 and 3.6 do not contain adequate detail of the potential contingency actions for the groundwater monitoring systems. Reference to the PSVP is not adequate.

Section 4 - Long-term Maintenance at WB/A-Site OU does not include any monitoring of the riverbank stabilization measures, erosion control system, or the restored/created wetlands. It will be necessary to monitor these areas during the long-term maintenance phase of the project.

Section 4.1 will need to specify the anticipated mowing frequency instead of referencing that the final cover system will be mowed periodically.

Section 4.2 will need to provide additional detail regarding conditions that would trigger replacement of additional erosion and control measures within storm water management features instead of referencing periodic placement.

Section 4.3 will need to provide additional detail regarding conditions that would trigger maintenance activities, specifically re-installation of a well.

Section 6 will need to provide additional detail regarding the alternate operation and maintenance procedures for temporary and/or permanent managing of materials in such

a way to prevent the release of polychlorinated biphenyls beyond regarding, containerizing, stockpiling, and replacing final cover materials.

It may be necessary to complete a Post-Closure Inspection Form for each of the landfills instead of summarizing all conditions onto one form.

### **Remedial Design Specification**

#### **Section 02320**

This section does not specify the testing frequency for particle size (1 per 2,500 cubic yards [cyd]) and permeability (1 per 5,000 cyd) for the gas venting sand or the other specified fill materials.

The MDEQ recommends that the USEPA provides these comments to the potentially responsible parties for evaluation and incorporation into the final submittal of the Final Remedial Design for the Willow Boulevard/A-Site Landfill. The MDEQ looks forward to assisting the USEPA with this site in the future. If you have any questions regarding these comments, please contact me at your earliest convenience.

Sincerely,



Kristi Zakrzewski, P.E.

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Specialized Sampling Unit  
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cc: Mr. Jeff Keiser, CH2M Hill  
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Mr. John Bradley, MDEQ  
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